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May 19, 1995

BY HAND DELIVERY

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

Re: Review of the Commission's Regulations Governing
Television Broadcasting (MM Docket No. 91-221)
Television Satellite Stations - Review of Policy and Rules
(MM Docket No. 87-8)

Dear Mr. Caton:

Transmitted herewith are on original and four copies of an Errata to the
Comments which Capitol Broadcasting Company, Inc., licensee of WRAL-TV, Raleigh,
North Carolina, submitted in the above-referenced proceedings on May 17, 1995. This
Errata provides the requisite Summary and Table of Contents for the Comments.

Should any questions arise concerning this matter, please contact this office.

Very truly yours,



Kathryn A. Kleiman

KAK/bll
Enclosures

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BEFORE THE

Federal Communications Commission

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of

Review of the Commission's Regulations
Governing Television Broadcasting

Television Satellite Stations
Review of Policy and Rules

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) MM Docket No. 91-221
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) MM Docket No. 87-8
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Directed to: The Commission

ERRATA TO COMMENTS OF CAPITOL BROADCASTING COMPANY, INC.

Capitol Broadcasting Company, Inc. ("Capitol"), by its attorneys, hereby respectfully submits its Errata to the "Comments of Capitol Broadcasting Company, Inc." ("Comments") that were filed in the above-referenced consolidated proceeding on May 17, 1995, and states as follows:

After Capitol filed its Comments in this proceeding, it discovered that its Summary and Table of Contents were inadvertently omitted from the Comments, as filed. Attached hereto are the Summary and Table of Contents that should have been included with the Comments. It is respectfully requested that the Comments, as filed, be corrected to include the attached Summary and Table of Contents.

Respectfully submitted:
CAPITOL BROADCASTING COMPANY, INC.

By: 
Marvin Rosenberg
Kathryn A. Kleiman

Its Attorneys

FLETCHER, HEALD & HILDRETH, P.L.C.
1300 North 17th Street, 11th Floor
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May 19, 1995

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

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Directed to: The Commission

COMMENTS OF CAPITOL BROADCASTING COMPANY, INC.

SUMMARY

Capitol Broadcasting Company, Inc. ("Capitol") submits its Comments in the above-captioned proceeding and urges the Commission, in evaluating its Ownership Rules, to fully recognize the necessity to protect the economic viability of local television broadcast stations in order that these stations may continue to effectively program to their service areas.

Capitol is the licensee of television station WRAL-TV, Raleigh, North Carolina. Since its inception in 1956, the station has been owned by Capitol. As a long term broadcast licensee with an excellent record of service to its community, Capitol is in an excellent position to comment in this proceeding. Based on its long experience in operating television stations, Capitol is well aware of the current problems and economic conditions affecting the broadcasting industry. Capitol supports retention of the present national ownership limitations in order to assure the continued economic viability of local stations to serve their communities and the elimination of the radio-television cross-ownership (the one-to-a-market) rule.

Capitol fully recognizes the dramatic growth in the availability of video programming (entertainment and non-entertainment) sources to the consumer. In light of all of these competitive sources, the Commission cannot fail to recognize the need to preserve free over-the-air television broadcasting. For, as the Commission knows, it is the television licensee who is charged with an exceptional public interest responsibility. Further, the local television broadcast stations remain as the source primarily looked to by the public for local news and public affairs programming, as well as emergency broadcast information. To preserve a strong local television broadcast service, the Commission should retain the present national ownership limitations. A failure to so act by the Commission will result in adverse consequences to the financial stability of the local station. Increases in ownership caps and the numerical station ownership limits will only exacerbate the present, and ever increasing, competitive market in which the local station is engaged.

Capitol also demonstrates herein that the FCC's present cross-ownership rule on radio-television is no longer necessary to ensure diversity in the local programming market because of the differences in program services provided by radio and television. The Commission permits, on a waiver basis, cross-ownerships in the top 25 markets, where there are 30 or more voices, if the waiver request involves a failed station, or if the waiver request presents a satisfactory public interest demonstration. Capitol is unaware of any Commission decision which has found, subsequent to a permitted transfer or assignment, that consequences adverse to the public interest have resulted.

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